



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
2890 WOODBRIDGE AVENUE
EDISON, NEW JERSEY 08837

202209



By Facsimile and Regular U.S. Mail

September 20, 2000

Mr. Tim Francisco
Oxford Environmental
43 Route 46 East, Suite 702
Pine Brook, New Jersey 07058

Re: Cornell-Dubilier Electronics Site
Administrative Order CERCLA-02-2000-2005

Dear Mr. Francisco:

EPA has by disapproved the Removal Action Work Plan dated August 2000 for work at 126 Spicer and requires it be modified to address the following comments.

Work Plan

Section 2.3 - Vertical Delineation

Vertical delineation is to be performed at 3 locations: near CDFF014, CDFF017 and between CDFF009 and CDFF 012.

Section 4.2 - Scope of Excavation

3rd Bullet - In the case described, where the vertical limit of excavation is set 6" below the limit of the deepest soil sample, a bottom verification sample is required and must still meet the cleanup criteria (i.e. 95% UCL < 1.0) must be met.

4th Bullet - Verification Samples will not be allowed in the additional excavation areas. (No additional excavation areas are proposed).

Section 4.3 - Statistical Identification of Remedial Excavation Limits

Delete the word "arithmetic" from last sentence, this presumes the data is distributed normally.

Section 4.4 - Excavation Procedures

Excavations that are not filled at the end of a workday are to be secured with construction fence.

Section 4.5 - Soil Loading and Staging Procedures

Contaminated soil stockpiled on plastic may be spilled onto underlying sod during load out. If this occurs the contaminated sod is to be removed and replaced.

Section 4.6 - Equipment Decontamination Procedures

Equipment that remains on-site at the end of the work day that has not been decontaminated is to be secured with construction fencing.

Section 4.7 - Property Restoration

Prior to initiation of excavations EPA will be provided with certifications or analytical data documenting that the sources of fill and topsoil are free of contaminants. Certification shall include a statement indicating that the subject material is from a virgin source having no previous industrial or agricultural use and is free of contamination. Analytical data shall at a minimum include Target Compound List plus 30 and Target Analyte List parameters and will be compared with NJDEP Soil Cleanup Criteria for residential direct contact to determine acceptability.

Section 5.4 - Security

Off-hours security is to be provided if residents are relocated.

Section 6.2 - Disposal Requirements

Waste profiles, certification sheets and supporting documentation shall be submitted to EPA for review and approval prior to submission to the proposed disposal facility. Sample waste manifests shall be submitted to EPA for review at least 5 days prior to shipment.

Appendix B - Health and Safety Plan

Section 6.2 - Physical Hazards

Provide the Safety Procedures referenced in Table. Also include a discussion of hearing protection, as indicated. *Not provided*

Section 6.3.1 - Worker Chemical Hazard Assessment

The discussion of hazards associated with direct contact and ingestion needs to be clarified.

Section 6.3.2 - Residential Exposure Chemical Hazard Assessment

OSHA PEL and ACGIH TLV may not be appropriate for residential exposure. NIOSH recommends an exposure level of 0.001mg/m³ for PCBs. Conservative assumptions should be employed in assessing potential exposures for residents.

Section 10.1 - Action Level

The action level calculated using the maximum soil concentration found at the property (6.2 mg/kg) and the NIOSH exposure level (0.001mg/m³) is 16 mg/m³. The calculated action level is higher than the nuisance dust standard (TWA = 10 mg/m³), as a result the action level would default to the nuisance dust standard. Notwithstanding, it would be prudent to implement dust suppression measures if visible dust is generated during excavation and load out of contaminated soils. This would preempt concerns of a perceived threat from exposure to PCBs in dust generated from site activities.

Appendix C - Treatment and Disposal Facility Information

Clean Earth of New Castle Delaware was proposed to receive PCB contaminated soil from the Tier 1 residential soil removal. Upon notification of the planned waste shipment, the State of Delaware raised objections to the shipment. Disposal of PCB contaminated soils was delayed until acceptance at an alternate disposal facility could be arranged. An alternate disposal facility should be identified in the event that Delaware again raises objections to the shipment of PCB contaminated soil to this facility.

Appendix E - Restoration Plan

Provide. A Replacement Landscape Plan shall be prepared and submitted to EPA for review and approval prior to initiation of excavation activities. This plan shall include an inventory of the plantings that may be disturbed or impacted as a result of planned remediation activities and specifications for landscape materials, replacement plantings and installation.

All plant material shall conform to the standards of the American Association of Nurserymen.

All plant material shall be guaranteed for one year after the date of final acceptance by EPA. Any plant material that dies within that time period shall be removed and replaced by a tree of similar size and species.

The lawn at 126 Spicer Avenue is mature. Disturbed areas of the lawn should therefore be replaced with sod, rather than seed as specified in the plan.

Please submit the revised work plan within 7 days of receipt of this notice. If you have any questions about the contents of this letter or the required work do not hesitate to call me at (732) 906-6991.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Wilson", followed by a long horizontal flourish.

Eric Wilson
On-Scene Coordinator